

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Pulp, Paper & Paperboard Manufacturing **DATE:** 5-11-98
Effluent Guidelines

FROM: EPA Region III

TO: POTW Pretreatment Program Managers

Final amendments to the Pulp, Paper & Paperboard Manufacturing effluent guidelines were published in the Federal Register on April 15, 1998 (63 FR 18503) and become effective on June 15, 1998. This action promulgates effluent limitations guidelines and standards under the Clean Water Act (CWA) for a portion of the pulp, paper, and paperboard industry, and national emission standards for hazardous air pollutants (NESHAP) under the Clean Air Act (CAA) for the pulp and paper production source category.

This amendment to the pulp & paper manufacturing categorical standards consolidates into 12 subcategories what had once been 26 subcategories of effluent limitations guidelines and standards for the pulp, paper, and paperboard industry, and revises the existing effluent limitations guidelines and standards for the Bleached Papergrade Kraft and Soda subcategory (now subpart B) and the Papergrade Sulfite subcategory (now subpart E). The revised effluent limitations guidelines and standards require existing and new facilities within these two subcategories to further limit the discharge of pollutants into navigable waters of the United States and into publicly owned treatment works.

EPA is also promulgating best management practices under the CWA for a portion of the pulp, paper, and paperboard industry, and new analytical methods for 12 chlorinated phenolic pollutants and for adsorbable organic halides (AOX). Please refer to the Federal Register for more details

As a result of the promulgation of this amendment, any industrial user subject to the limitations in the Bleached Papergrade Kraft and Soda subcategory or the Papergrade Sulfite subcategory must submit a Baseline Monitoring Report (BMR) addressing the new requirements within 180 days of the effective date of the amendments. The BMR is due December 14, 1998. As

noted in the preamble to the amendment, the new source date for these new standards is December 17, 1993, and the compliance date is April 16, 2001. This does not revise the compliance date for the standards that had been in existence prior to this amendment.

For POTWs with industries subject to the two revised subcategories, several actions are warranted. Although it is the user's responsibility to submit the BMR, it is the POTW's responsibility to enforce the BMR submission requirement. If the BMR is more than 30 days late, the user would be in significant noncompliance for failing to report. POTWs should begin contacting users that they suspect are affected by this amendment and remind them of the BMR requirement and due date.

Upon receipt and review of the user's BMR, the POTW should consider amending or reissuing the user's discharge permit to incorporate the new limits and any compliance schedules submitted as part of the BMR (note that the compliance schedule must be in accordance with 40 CFR 403.12(b)(7) & 403.12(c)), and to require compliance with the new standards by April 16, 2001. At a minimum, the permit of any affected user must be amended or reissued sometime prior to April 16, 2001 to incorporate the new requirements. Inspections for affected users should also begin to focus on compliance with the new requirements.

If you have any questions regarding this matter, please contact your EPA or State contact.